

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

Conservation Law Foundation, Inc.,)	
)	
Plaintiff)	
)	
v.)	No. 1:17-cv-00396-WES-LDA
)	
Shell Oil Products US,)	
Shell Oil Company,)	
Shell Petroleum Inc.,)	
Shell Trading (US) Company)	
Motiva Enterprises LLC,)	
Triton Terminaling LLC, and)	
Equilon Enterprises LLC)	
)	
Defendants.)	
)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER
GOVERNING THE PRODUCTION AND EXCHANGE OF DISCOVERY

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Local Rule Gen. 102, Plaintiff Conservation Law Foundation (“CLF”) and Defendants Shell Oil Products US, Shell Oil Company, Shell Petroleum, Inc., Shell Trading (US) Company, Motiva Enterprises LLC, Triton Terminating LLC, and Equilon Enterprises LLC (collectively, “Defendants”) hereby jointly move the Court for entry of their proposed Stipulated Protective Order Governing the Production and Exchange of Discovery (“Protective Order”), filed herewith as Exhibit A.

CLF and Defendants believe that the proposed Protective Order will: (i) adequately protect information the parties are entitled to keep confidential; (ii) ensure that only materials the parties are entitled to keep confidential are subject to such treatment; (iii) ensure that the parties are permitted reasonably necessary use of such materials throughout discovery in this litigation; and (iv) facilitate the prompt resolution of disputes over the production and confidentiality of discovery

materials. The proposed Protective Order permits the parties to designate discovery materials, including depositions and other pre-trial testimony, as confidential or highly confidential, as appropriate. The Protective Order also provides protocols for the inadvertent disclosure of privileged information and information that should have been but was not properly labeled as confidential or highly confidential.

Accordingly, the parties respectfully request that the Court enter the proposed Protective Order.

Dated: December 7th, 2021.

Respectfully submitted,

/s/ Alexandra St. Pierre

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CERTIFICATE OF SERVICE

I hereby certify that on December 7th, 2021, the foregoing Joint Motion for Entry of Stipulated Protective Order Governing the Production and Exchange of Discovery was filed through the Court's electronic filing system ("ECF"), by which means the document is available for viewing and downloading from the ECF system and a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Roy D. Prather
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